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west virginia department of environmental protection

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Division of Water and Waste Management  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone Number: (304) 926-0495  
Fax Number: (304) 926-0463

Austin Caperton, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

July 30, 2018

Mark H. Gaston, Sr. Env. Consultant  
Kuraray America, Inc.  
8480 DuPont Road  
Washington, WV 26181

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Re: WV/NPDES Permit No. WV0001279  
Chemours Company – Washington Works

Dear Mr. Gaston:

This correspondence is in response to your comment letter dated June 18, 2018 regarding WV/NPDES Water Pollution Control Permit No. WV0001279 for the Chemours' Washington Works facility located in Washington, WV. Comments are summarized, followed by the agency's response.

***Comment 1: Kuraray requests that the term Butacite® be replaced with "Kuraray Polyvinyl Resin" wherever it appears in the permit.***

The requested revisions have been made. Sections A.125, C.28 and associated references in the Fact Sheet have been revised.

***Comment 2: Revise Section C.5 and C.28.***

Based on comments received from both Chemours Company and E.I. DuPont, Section C.5 has been revised. Kuraray's comment was taken into consideration.

Section C.28 has also been revised based on Kuraray's comment.

Again, the agency would like to thank you for your comments on draft WV/NPDES No. WV0001279. The Division of Water and Waste Management issued WV/NPDES Permit No. WV0001279 on July 30, 2018. Within 30 days of the issuance date of this permit, anyone who may be adversely affected or aggrieved by the permit terms and conditions may file a Notice of

Promoting a healthy environment.

Appeal with the Environmental Quality Board, 601 57<sup>th</sup> Street SE, Charleston, West Virginia 25304. Telephone (304) 926-0445. Thank you for your interest in this application.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Mandirola", written over a horizontal line.

Scott G. Mandirola  
Director

SGM:jvl

cc: Env. Inspector Supervisor  
EPA Region III



Mark H. Gaston  
Sr. Environmental Consultant  
Kuraray America, Inc.  
Washington Works Plant  
8480 DuPont Road  
Washington, WV 26181

June 18, 2018

Ms. Lori Devereux  
WV-Department of Environmental Protection  
Division of Waste and Waste Management, Permitting Section  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304-2345

Dear Ms. Devereux,

Kuraray Washington Works respectfully submits the following comments for the review process of the Draft NPDES permit WV0001279, for Chemours Washington Works, in Wood County.

In 2014, Kuraray Company Ltd. of Japan acquired the Polyvinyl Butyral (PVB) business of E. I. DuPont de Nemours and Company. Butacite®, a registered trademark of DuPont was used to refer to both the PVB product and the production facilities. Per agreement between DuPont and Kuraray, Kuraray may continue to use the term "Butacite®" only under very limited circumstances. Therefore, Kuraray requests the term "Butacite" be replaced with "Kuraray" or "Kuraray Polyvinyl Resin" as appropriate, wherever it appears in the permit.

The current wording of Condition C5 (page 72) is:

*Without prior approval from the agency, the permittee shall not accept and treat wastewater from any other non-Chemours owned or operated facility". Chemours may continue to accept wastewater from Little Hocking Service Center and Dry Run Landfill.*

The opening sentence of Condition C28 (page 79) is:

*Without prior approval from the agency, the permittee shall not accept and treat wastewater from any other facility other than those listed below:*

Following this sentence are listed six line items, of which the fourth and fifth are:

	Outlet	SIC Code	Category
Kuraray	125	2821,	40 CFR 414
-	Butacite (Polyvinyl butyral Resin)		
Kuraray (NCCW)	103/202		
-	Butacite (Polyvinyl butyral Resin)		

So that Condition C5 will be consistent with Condition C28, Kuraray requests that the second sentence of Section C5 be changed to "Chemours may continue to accept wastewater from Little Hocking Service Center, Dry Run Landfill, and Kuraray (Polyvinyl Butyral Resin).

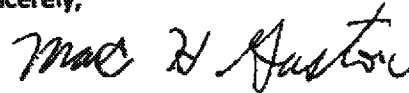
The first sentence of Condition C28.a.3 (page 80) is:

*The wastewater approved for acceptance from Kuraray consists of non-contact cooling water (Outlets 002, 003, 105), steam condensate (Outlet 003), process sanitary sewer (Outlet 105), and storm water runoff (Outlets 002, 003) from the manufacturing of polyvinyl butyral resins (Butacite).*

However, Kuraray contributes steam condensate flows to both Outlets 002 and 003. Also Kuraray contributes process wastewater to Outlet 105. Therefore Kuraray requests that this sentence be revised to read:

*The wastewater approved for acceptance from Kuraray consists of non-contact cooling water and steam condensate (Outlets 002, 003, 105), process wastewater and process sanitary sewer (Outlet 105), and storm water runoff (Outlets 002, 003) from the manufacturing of polyvinyl butyral resins.*

Sincerely,



Mark H. Gaston  
Sr. Environmental Consultant  
Kuraray America, Inc.  
Washington Works Plant